

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Wayne Gregory Little Debtor : CHAPTER 13
MIDFIRST BANK Movant :
v. NO. 20-00023 RNO
Wayne Gregory Little Debtor :
and
Charles J. DeHart, III Esq. Trustee : 11 U.S.C. Section 362

**DEBTOR, WAYNE GREGORY LITTLE,
RESPONSE AND OBJECTION TO MOTION
FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY MOVANT MIDFIRST BANK
UNDER SECTION 362**

Presently before me is a motion filed by Midfirst Bank, requesting for relief from the automatic stay filed by Movant, Midfirst Bank.

Debtor, Wayne Gregory Little, clearly opposes the "Motion for relief from the automatic stay" filed by Movant Midfirst Bank, under section 362.

1. Movant is MIDFIRST BANK.

Debtor agrees.

2. Debtor(s) is/are the owner(s) of the premises 110 Snowshoe Court aka Lot 15 Sec.5 Wild Acres, Dingmans Ferry, PA 18328, hereinafter referred to as the mortgaged premises.

Debtor disagrees.

3. Charles J. DeHart, III Esq., is the Trustee appointed by the Court.

Debtor agrees.

4. Movant is the holder of a mortgage, original principal amount of \$44,000.00 on the mortgaged premises that was executed on November 21, 1998. Said mortgage was recorded on November 23, 1998 at Book 1650, Page 294. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on August 18, 2008, at Book 2286, Page 1529 in Pike County.

Debtor agrees.

5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor.

Debtor agrees.

6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$473.67 for the month of February 2020 and \$455.46 for the month of March 2020 with a late charge in the amount of \$18.21.

Debtor disagrees.

7. The total amount necessary to reinstate the loan post-petition is \$947.34.

Debtor disagrees.

8. Debtor's Chapter 13 plan proposes pre-confirmation conduit payments to Movant, but as of the date of this motion Debtor has not made any plan payments.

Debtor disagrees.

9. Movant is entitled to relief from the automatic stay for cause pursuant to 11 U.S.C. § 362(d).

Debtor disagrees.

10. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred \$850.00 in legal fees and \$181.00 in legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

Debtor disagrees.

11. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, for the above stated reasons, Debtor/Respondent, respectfully requests this Honorable Court to:

(1) Enter an Order denying the Motion and keeping the automatic stay in force against the Movant, Midfirst Bank.

Respectfully Submitted,



WAYNE GREGORY LITTLE

Debtor

Pro Se

CERTIFICATE OF SERVICE

A copy of this document was served upon Plaintiff's attorney at the following address:
James C. Warmbrodt, Esquire Attorney I.D. No.42524 KML Law Group, P.C. 701 Market Street,
Suite 5000 Philadelphia, PA 19106-1532 by ordinary U.S. Mail, postage pre-paid, this
01 day of May, 2020.



WAYNE GREGORY LITTLE

Cindy Boyle

From: pambml_automation@pamb.uscourts.gov on behalf of PAMB <rick_thompson@pamb.uscourts.gov>
Sent: Tuesday, May 5, 2020 11:12 AM
To: PAMBml_fax
Subject: EDSS filing from WAYNE GREGORY LITTLE for on Tuesday, May 5, 2020 - 11:11

Submitted on Tuesday, May 5, 2020 - 11:11 Submitted by user: Anonymous Submitted values are:

Filer's Name: WAYNE GREGORY LITTLE

Debtor's name (if different):

Filer's EMail Address: grease_monkey18328@yahoo.com Filer's Phone Number: 813-599-1991

Case number (if known): 5:20-bk-00023-RNO

==Documents==

Document 1:

<http://www.pamb.uscourts.gov/sites/default/files/webform/edss/BANKRUPTCY%20OBJECTION%20TO%20MOTION%2005-01-2020.pdf>

Document description: BANKRUPTCY OBJECTION TO MOTION FOR RELIEF
FROM AUTOMATIC STAY

==More Documents==

Document 2:

Document 2 description:

Document 3:

Document 3 description:

Document 4:

Document 4 description:

Document 5:

Document 5 description:

By entering my name in the box below, I affirm that I am intending to sign this form with my signature and consent to use this electronic form.: WAYNE GREGORY LITTLE